

\$400

PD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

MALIBU MEDIA, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
108.16.46.52,

Defendant.

Civil Action No. _____

FILED

MAY 20 2013

MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk

**COMPLAINT-ACTION FOR DAMAGES FOR
PROPERTY RIGHTS INFRINGEMENT**

Plaintiff, Malibu Media, LLC, sues Defendant John Doe subscriber assigned IP address
108.16.46.52, and alleges:

Introduction

1. This matter arises under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").
2. Defendant is a persistent online infringer of Plaintiff's copyrights. Indeed, Defendant's IP address as set forth on Exhibit A was used to illegally distribute each of the copyrighted movies set forth on Exhibit B.
3. Plaintiff is the registered owner of the copyrights set forth on Exhibit B (the "Copyrights-in-Suit.")

Jurisdiction And Venue

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair competition).

5. The Defendant's acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore this Court has personal jurisdiction over the Defendant because (a) Defendant committed the tortious conduct alleged in this Complaint in this State, and (i) Defendant resides in this State and/or (ii) Defendant has engaged in substantial and not isolated business activity in this State.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because each Defendant or Defendant's agent resides or may be found in this District.

Parties

7. Plaintiff, Malibu Media, LLC, is a limited liability company organized and existing under the laws of the State of California and has its principal place of business located at 409 W. Olympic Blvd., Suite 501, Los Angeles, CA, 90015.

8. Plaintiff only knows Defendant by his, her or its IP Address. Defendant's IP address is set forth on Exhibit A.

9. Defendant's Internet Service Provider can identify the Defendant.

Factual Background

I. Defendant Used the BitTorrent File Distribution Network To Infringe Plaintiff's Copyrights

10. The BitTorrent file distribution network ("BitTorrent") is one of the most common peer-to-peer file sharing venues used for distributing large amounts of data, including, but not limited to, digital movie files.

11. BitTorrent's popularity stems from the ability of users to directly interact with each other in order to distribute a large file without creating a heavy load on any individual source computer and/or network. The methodology of BitTorrent allows users to interact directly with each other, thus avoiding the need for intermediary host websites which are subject to DMCA take down notices and potential regulatory enforcement actions.

12. In order to distribute a large file, the BitTorrent protocol breaks a file into many small pieces called bits. Users then exchange these small bits amongst each other instead of attempting to distribute a much larger digital file.

13. After the infringer receives all of the bits of a digital media file, the infringer's BitTorrent client software reassembles the bits so that the file may be opened and utilized.

14. Each bit of a BitTorrent file is assigned a unique cryptographic hash value.

15. The cryptographic hash value of the bit ("bit hash") acts as that bit's unique digital fingerprint. Every digital file has one single possible cryptographic hash value correlating to it. The BitTorrent protocol utilizes cryptographic hash values to ensure each bit is properly routed amongst BitTorrent users as they engage in file sharing.

16. The entirety of the digital media file also has a unique cryptographic hash value ("file hash"), which acts as a digital fingerprint identifying the digital media file (e.g. a movie). *Once infringers complete downloading all bits which comprise a digital media file, the*

BitTorrent software uses the file hash to determine that the file is complete and accurate.

17. Plaintiff's investigator, IPP Limited, established a direct TCP/IP connection with the Defendant's IP address as set forth on Exhibit A.

18. IPP Limited downloaded from Defendant one or more bits of each of the digital movie files identified by the file hashes on Exhibit A.

19. Each of the cryptographic file hashes as set forth on Exhibit A correlates to copyrighted movies owned by Plaintiff as identified on Exhibit B.

20. IPP Limited downloaded from Defendant one or more bits of each file has listed in Exhibit A. IPP Limited further downloaded a full copy of each file hash from the BitTorrent file distribution network and confirmed through independent calculation that the file hash matched what is listed on Exhibit A. IPP Limited then verified that the digital media file correlating to each file hash listed on Exhibit A contained a copy of a movie which is identical (or alternatively, strikingly similar or substantially similar) to the movie associated with that file hash on Exhibit A. At no time did IPP Limited upload Plaintiff's copyrighted content to any other BitTorrent user.

21. IPP Limited downloaded from Defendant one or more bits of each digital media file as identified by its hash value on Exhibit A. The most recent TCP/IP connection between IPP and the Defendant's IP address for each file hash listed on Exhibit A is included within the column labeled Hit Date UTC. UTC refers to Universal Time which is utilized for air traffic control as well as computer forensic purposes.

22. An overview of the Copyrights-in-Suit, including each hit date, date of first publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

23. IPP Limited has also engaged in enhanced surveillance of other digital media files being distributed by Defendant. The results of this more intensive surveillance are outlined in Exhibit C. The Copyrights-in-Suit are solely limited to content owned by Plaintiff as outlined in Exhibit B. Exhibit C is provided for evidentiary purposes only.

24. As the subscriber in control of the IP address being used to distribute Plaintiff's copyrighted movies, Defendant is the most likely infringer. Consequently, Plaintiff hereby alleges Defendant is the infringer. Plaintiff has included as Exhibit D a solicitation of exculpatory evidence in the event that Defendant chooses to deny the allegations.

25. Defendant is the only person who can be identified as the infringer at this time.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I

Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

- (A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;
- (B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;
- (C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and
- (D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

- (A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;
- (B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;
- (C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages in the amount of \$150,000 per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

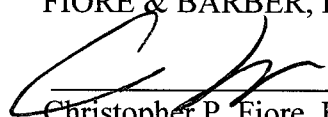
DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

FIORE & BARBER, LLC

By:



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ISP: Verizon Internet Services

Physical Location: Doylestown, PA

Hit Date UTC	File Hash	Title
03/27/2013 04:09:24	DA7B8E787C735B0429970B2B5F02A2EB00081787	Out of This World
01/12/2013 07:33:53	9C9A726B910173C5832A29A3DD6BDFAF64661221	Warm Inside
09/21/2012 03:48:09	34AA020D4C78AD23E1A741888887DBB6061C87DB	Underwater Lover
09/21/2012 03:09:40	2D58C7A02DE3E5168E85D0BF45A4036C512AAF88	Black Lingerie Bliss
08/06/2012 01:25:54	CC1A549BE7FBDCE82EFF7347A347BE68BB00719E	Farewell
07/28/2012 06:20:29	8E83A291FF3E20DD8C4F42092B6E0E4BAD5746AE	Come To My Window
07/19/2012 00:28:09	CF7E75EAF9225D5CA52F3F977206735C6FDEB632	Pink Orgasm
06/27/2012 03:02:14	947C9ACA3C175FF5F0BC229E1A562CE54C5ABB4E	Happy Couple
06/07/2012 03:42:14	9F82F4FC8A7ED2D93D4018E6CE9BEC78DDE51E6A	Young and Hot
05/18/2012 22:07:04	8371AF5FC7AFE5CE24955E3AF3084A29F6253199	Silver Bullets
04/25/2012 04:18:47	8347F054CEFAF38A95435CA9C94F2B1DDD2D27AF	Slow Motion
04/13/2012 01:02:06	143CBD213A5B550F233A7DEFD554414D71BCB76C	Wild at Heart
03/29/2012 05:19:29	8E652A4691B89D82EED34742C10B8CB852DA467D	Paradise Found
03/29/2012 05:02:16	43F39726CF50A4F81D920F748E8FFCC3B69CE1F8	Perfect Girls
03/14/2012 05:20:59	9E070302C41EA21DB5418EE434741B4562D6E4FB	California Dreams

Total Statutory Claims Against Defendant: 15

EXHIBIT A

EPA138

ISP: Verizon Internet Services

Physical Location: Doylestown, PA

Hit Date UTC	File Hash	Title
03/27/2013 04:09:24	DA7B8E787C735B0429970B2B5F02A2EB00081787	Out of This World
01/12/2013 07:33:53	9C9A726B910173C5832A29A3DD6BDFAF64661221	Warm Inside
09/21/2012 03:48:09	34AA020D4C78AD23E1A741888887DBB6061C87DB	Underwater Lover
09/21/2012 03:09:40	2D58C7A02DE3E5168E85D0BF45A4036C512AAF88	Black Lingerie Bliss
08/06/2012 01:25:54	CC1A549BE7FBDCE82EFF7347A347BE68BB00719E	Farewell
07/28/2012 06:20:29	8E83A291FF3E20DD8C4F42092B6E0E4BAD5746AE	Come To My Window
07/19/2012 00:28:09	CF7E75EAF9225D5CA52F3F977206735C6FDEB632	Pink Orgasm
06/27/2012 03:02:14	947C9ACA3C175FF5F0BC229E1A562CE54C5ABB4E	Happy Couple
06/07/2012 03:42:14	9F82F4FC8A7ED2D93D4018E6CE9BEC78DDE51E6A	Young and Hot
05/18/2012 22:07:04	8371AF5FC7AFE5CE24955E3AF3084A29F6253199	Silver Bullets
04/25/2012 04:18:47	8347F054CEFAF38A95435CA9C94F2B1DDD2D27AF	Slow Motion
04/13/2012 01:02:06	143CBD213A5B550F233A7DEFD554414D71BCB76C	Wild at Heart
03/29/2012 05:19:29	8E652A4691B89D82EED34742C10B8CB852DA467D	Paradise Found
03/29/2012 05:02:16	43F39726CF50A4F81D920F748E8FFCC3B69CE1F8	Perfect Girls
03/14/2012 05:20:59	9E070302C41EA21DB5418EE434741B4562D6E4FB	California Dreams

Total Statutory Claims Against Defendant: 15

EXHIBIT A

EPA138

Copyrights-In-Suit for IP Address 108.16.46.52

ISP: Verizon Internet Services

Location: Doylestown, PA

Title	Registration Number	Date of First Publication	Registration Date	Most Recent Hit UTC
Black Lingerie Bliss	PA0001806468	09/19/2012	09/19/2012	09/21/2012
California Dreams	PA0001780564	03/12/2012	03/12/2012	03/14/2012
Come To My Window	PA0001799576	07/27/2012	07/31/2012	07/28/2012
Farewell	PA0001800473	08/03/2012	08/07/2012	08/06/2012
Happy Couple	PA0001794461	06/25/2012	06/25/2012	06/27/2012
Out of This World	PA0001833294	03/28/2013	04/01/2013	03/27/2013
Paradise Found	PA0001783362	03/25/2012	03/26/2012	03/29/2012
Perfect Girls	PA0001783454	03/28/2012	03/28/2012	03/29/2012
Pink Orgasm	PA0001797944	07/16/2012	07/18/2012	07/19/2012
Silver Bullets	PA0001790373	05/13/2012	05/16/2012	05/18/2012
Slow Motion	PA0001787875	04/22/2012	04/23/2012	04/25/2012
Underwater Lover	PA0001806474	09/17/2012	09/20/2012	09/21/2012
Warm Inside	PA0001820856	01/11/2013	01/13/2013	01/12/2013
Wild at Heart	PA0001785969	04/08/2012	04/09/2012	04/13/2012
Young and Hot	PA0001794969	06/06/2012	06/08/2012	06/07/2012

Total Malibu Media, LLC Copyrights Infringed: 15

EXHIBIT B

EPA138

Expanded Surveillance of IP Address 108.16.46.52

ISP: Verizon Internet Services

Location: Doylestown, PA

Hit Date UTC	Filename
05/01/2013	The.Hobbit.An.Unexpected.Journey.2012.1080p.BluRay.x264-SPARKS [PublicHD]
04/30/2013	Doctor.Who.2005.S07E10.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
04/30/2013	The.Dark.Knight.Rises.2012.1080p.BluRay.x264-ALLiANCE [PublicHD]
04/30/2013	Game.of.Thrones.S03E05.720p.HDTV.x264-IMMERSE [PublicHD]
04/30/2013	Jack.Reacher.2012.1080p.BluRay.DTS.x264-PublicHD
04/29/2013	Livejasmin hack V5.001 Jan. 19th.rar
04/29/2013	Bones.S08E23.720p.HDTV.X264-DIMENSION [PublicHD]
04/28/2013	Subway_Surfers_ENG.rar
04/27/2013	x-art_angelica_getting_down_1080.mov
04/26/2013	[www.Torrenting.com] - Gabe.the.Cupid.Dog.2012.WEBRip XviD Feel-Free
04/26/2013	Far Cry 3 Blood Dragon
04/25/2013	259_Desi_College_Students_sex_Desisexblog.net.wmv
04/25/2013	Doctor_Who_2005.7x09.Hide.720p_HDTV_x264-FoV [PublicHD]
04/25/2013	Game.of.Thrones.S03E04.1080i.HDTV.MPEG2.DD5.1-CtrlHD [PublicHD]
04/24/2013	(C82) [ハイブリッド事務室 (室永叉焼)] ハイブリッド通信vol.11 (隻眼獣ミツヨシ) [DL版].zip
04/24/2013	Bree Olsen - Hard ass stretching-by manowa_19.wmv
04/21/2013	Tight young twink ass gets packed with cock
04/21/2013	[www.TorrentDay.com] - Monday.Mornings.S01E06.HDTV.XviD-AFG
04/20/2013	Criminal Minds Season 6 Complete 720p
04/20/2013	x-art_bunny_scarlet_tyler_fashion_models_1080.mov
04/19/2013	time and chaos v8057 setup and patch
04/19/2013	Jack.Reacher.2012.1080p.BluRay.AVC.DTS-HD.MA.7.1-PCH [PublicHD]

EXHIBIT C

EPA138

Hit Date UTC	Filename
04/19/2013	Game.of.Thrones.S03E03.720p.HDTV.x264-EVOLVE [PublicHD]
04/18/2013	[www.Speed.Cd] - Enlightened.S02E05.720p.HDTV.x264-IMMERSE
04/17/2013	Bones.S08E22.720p.HDTV.X264-DIMENSION [PublicHD]
04/15/2013	Doctor Who 2005 7x08 Cold War 720p HDTV x264-FoV [PublicHD]
04/14/2013	Game.of.Thrones.S03E02.1080p.WEB-DL.DD5.1.H.264-NTb [PublicHD]
04/14/2013	[R.G. Mechanics] Far Cry 3
04/13/2013	Flora (Teen, Group) HD XXX
04/13/2013	Hinder - Extreme Behavior (Extreme Deluxe Edition) [320kbps] [iSpeedz]
04/10/2013	The.Typing.Of.The.Dead.II.JAP-NETSHOW
04/09/2013	Doctor_Who_2005.7x07.The_Rings_Of_Akhaten.720p_HDTV_x264-FoV [PublicHD]
04/06/2013	Hegre-Art.13.03.19.Kiki.50.Shades.Of.Gray.XXX.720p.MOV-KTR
04/04/2013	0220 이브닝뉴스 임현진날씨.ts
04/04/2013	How.I.Met.Your.Mother.S08E17.FASTSUB.VOSTFR.HDTV.XviD-ADDiCTION
04/04/2013	01 Doll.m4a
04/04/2013	Life.of.Pi.2012.720p.WEB-DL.DD5.1.H.264-HD4FUN
04/03/2013	Fringe.S05E11.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
04/03/2013	Fringe.S05E12.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
04/03/2013	Fringe.S05E13.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
04/02/2013	BioShock_Infinite-FLT
04/02/2013	Django.Unchained.2012.1080p.BluRay.DTS.x264-PublicHD
04/02/2013	Bones.S08E21.720p.HDTV.X264-DIMENSION.mkv
04/02/2013	Bones.S08E21.720p.HDTV.X264-DIMENSION [PublicHD]
04/02/2013	Game.of.Thrones.S03E01.720p.HDTV.x264-EVOLVE [PublicHD]
04/01/2013	The Mummy Trilogy 1999-2008 BDRip 1080p DTS HighCode- PublicHD
04/01/2013	[www.UsaBit.com] - Game.of.Thrones.S03E01.720p.HDTV.x264-EVOLVE
03/30/2013	Doctor_Who_2005.7x06.The_Bells_Of_Saint_John.720p_HDTV_x264-FoV [PublicHD]

EXHIBIT C

Hit Date UTC	Filename
03/30/2013	Dishonored Dunwal City Trials DLC Free Installer
03/29/2013	X-Art - Out Of This World - Angelica [1080p].mov
03/29/2013	Anjelica - Sex Lessons For A Princess.mp4
03/29/2013	Spektrum
03/26/2013	Bones.S08E19.720p.HDTV.X264-DIMENSION.mkv
03/26/2013	Bones.S08E18.720p.HDTV.X264-DIMENSION.mkv
03/26/2013	Bones.S08E20.720p.HDTV.X264-DIMENSION [PublicHD]
03/25/2013	Bones.S08E17.720p.HDTV.X264-DIMENSION.mkv
03/25/2013	Bones.S08E17.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
03/16/2013	X-Art.13.03.08.Angelica.Spilled.Milk.XXX.1080p.MOV-KTR
03/16/2013	Marty Wilde - Frantic Fifties
03/16/2013	Cuneo-Macerata 3.VOB
03/14/2013	THE HuMaN CeNtiPedE II (Full Sequence) TS
03/12/2013	Top_Gear.19x06.720p_HDTV_x264-FoV [PublicHD]
03/12/2013	[AnimeTL] K-ON! Movie ED - Singing! [SUB 1080p].exe
03/11/2013	Top_Gear.19x07.720p_HDTV_x264-FoV [PublicHD]
03/10/2013	Skyfall.2012.1080p.BluRay.x264-DAA [PublicHD]
03/10/2013	The.Hobbit.An.Unexpected.Journey.2012.1080p.BluRay.x264-SPARKS
03/08/2013	Clubbers Hit Mix vol.7 (2010)
03/08/2013	Community S04E04 HDTV x264 AAC-mSD
03/07/2013	Tomb.Raider-SKIDROW
03/05/2013	Tomb Raider Survival Edition (2013) [PCDVD][MULTi14][WwW.LoKoTorrents.CoM]
03/05/2013	Tomb Raider SURVIVAL EDITION STEAM FULL UNLOCKED
03/05/2013	Tomb Radier.Sruvival.Edition-SC
03/05/2013	Tomb.Raider-SKIDROW
02/28/2013	_Milky_-_After1.rar

EXHIBIT C

Hit Date UTC	Filename
02/28/2013	Lincoln (2012) SA Bluray 720p X264 Hd Free
02/26/2013	[www.Torrenting.com] - Top.Gear.S19E05.720p.HDTV.x264-RIVER
02/26/2013	Crysis.3.Crackfix.2.INTERNAL-RELOADED
02/24/2013	Zoe_Anjelica_Share_Your_Delight_HD1080.mp4
02/24/2013	FTV - 2013-02-16 - Eliana - Wet First Time Orgasms
02/24/2013	Crysis.3.v1.0.Plus.6.Trainer-FLING.rar
02/24/2013	WowPorn - Share Your Delight - Anjelica, Zoe [720p].mp4
02/23/2013	Crysis 3 CRACK ONLY-RELOADED.zip
02/23/2013	Crysis.3.INTERNAL-RELOADED
02/23/2013	Crysis.3.CRACK.Fix.ONLY-P2P
02/23/2013	Crysis3.Digital.Deluxe
02/22/2013	Bones.S08E16.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
02/22/2013	Bones.S08E15.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
02/21/2013	[www.Torrenting.com] - Top_Gear.19x04.720p_HDTV_x264-FoV
02/21/2013	Top_Gear.19x04.720p_HDTV_x264-FoV [PublicHD]
02/12/2013	Top_Gear.19x03.720p_HDTV_x264-FoV [PublicHD]
02/11/2013	Top Gear 19x03 720p HDTV x264-FoV
02/09/2013	The Shootist.avi
02/09/2013	David Dunn - For the Life of Me
02/07/2013	Bones S08E13 720p WEB-DL DD5 1 H 264-ECI [PublicHD]
02/06/2013	Bones.S08E14.720p.HDTV.X264-DIMENSION [PublicHD]
02/06/2013	Blitz {2011} Limited 720p BRRip x264 - Kickassddl
02/06/2013	Top_Gear.19x02.720p_HDTV_x264-FoV
02/05/2013	Tatum
01/30/2013	Stephanie_Gloria_Eat_My_Clit_HD1080.mp4
01/29/2013	O Jogo Da Verdade [1992].wmv

EXHIBIT C

Hit Date UTC	Filename
01/29/2013	Top_Gear.19x01.720p_HDTV_x264-FoV
01/26/2013	prnfile1316x.mp4
01/26/2013	The Mentalist Season 1 Complete 720p
01/26/2013	[www.Speed.Cd] - MythBusters.S11E09.Plane.Boarding.Bite.the.Bullet.CONVERT.720p.HDTV.x264-DHD
01/26/2013	Anjelica_An_Ardent_Interconnection_HD1080.wmv
01/26/2013	[www.Speed.Cd] - Mythbusters.S11E04.720p.HDTV.x264-ORENJI
01/25/2013	(C81) [AHOBACA (aho)] キツネコ！ (オリジナル) [DL版].zip
01/25/2013	Cloud.Atlas.2012.1080p.BluRay.DD5.1.x264-HDMaNiAcS
01/25/2013	MythBusters.S11E05.Mini.Myth.Medley.720p.HDTV.x264-DHD [PublicHD]
01/24/2013	South.Park.Season.16.Complete.UNCENSORED.720p.WEB-DL.x264.AAC
01/23/2013	Bones.S08E12.720p.HDTV.X264-DIMENSION [PublicHD]
01/23/2013	Langhorns - Langhorns [2012 ALBUM]
01/23/2013	Damages S01E13 (Rip-NOTV)[VTV].avi
01/22/2013	Hi-Fidelity Dub Sessions, Vol. 5
01/22/2013	x-art_angelica_a_little_rain_must_fall_1080.wmv
01/22/2013	Battleship.2012.1080p.BluRay.DTS.x264-SPARKS [PublicHD]
01/22/2013	X-Art - A Little Rain Must Fall - Angelica [1080p].mov
01/21/2013	Wrath.of.the.Titans.2012.1080p.BluRay.x264.DTS-HDChina [PublicHD]
01/21/2013	Teens_Want_Double_9.DvdRip.2012_jyutero.com
01/21/2013	windows 8 full crack privet now free downloed
01/18/2013	Cold_Case_Kein_Opfer_ist_je_vergessen_12.11.13_12-00_kabel1_55_TVOON_DE.mpg.avi.otrkey
01/15/2013	Fantocci.v.raju.1993.XviD.DVDRip.avi
01/13/2013	The Raven (Spanish) DVDRip.XViD ETRG
01/13/2013	Dredd.2012.1080p.BluRay.x264-SPARKS [PublicHD]
01/12/2013	YoungLegalPorn.12.12.31.Anjelica.And.Ella.An.Unexpected.Visit.XXx

EXHIBIT C

Hit Date UTC	Filename
01/12/2013	Everybody.Hates.Chris.S01E10.HDTV.XviD-LOL.avi
01/12/2013	YoungLegalPorn - Deeper Means Better - Alexis Crystal [1080p].mp4
01/12/2013	Susie.Clover.Warm.Inside.XArt.2013.FullHD_ityutero.com.mov
01/08/2013	Fringe.S05E09.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
01/08/2013	Fringe.S05E10.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
01/06/2013	Doctor.Who.2005.S07E05.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
01/06/2013	Fringe.S05E08.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
01/05/2013	18 Only Girls - Slide It In My Pussy HD 720p
01/05/2013	FTV.2013-01.Melody.Lena.XXX.[Pirates-Vault]
12/31/2012	Fringe S05E06 720p WEB-DL DD5.1 H264-EbP [PublicHD]
12/28/2012	Doctor_Who_2005.2012_Christmas_Special.The_Snowmen.720p_HDTV_x264-FoV [PublicHD]
12/28/2012	Top.Gear.50.Years.of.Bond.Cars.720p.HDTV.x264-FoV.mkv
12/27/2012	Top.Gear.Apocalypse.2010.720p.BluRay.x264-LEGENDARY
12/25/2012	x-art_angelica_naughty_and_nice_1080.mov
12/19/2012	Minority Report (2002) BDRip 1080p HighCode-PHD
12/19/2012	Far Cry 3 Update 1.02--AviaRa--
12/17/2012	[www.TorrentDay.com] - Rizzoli.and.Isles.S03E13.HDTV.x264-LOL
12/16/2012	YoungLegalPorn.12.11.30.Elisa.A.And.Irina.K.A.Lesbian.Kiss.XxX
12/16/2012	Anjelica - Hardcore Tricks - HD1080.mp4
12/16/2012	pf0033-ihd-1.mp4
12/16/2012	WowGirls - Love Is For Two - Anjelica, Natasha Von [720p].mp4
12/16/2012	YoungLegalPorn - You Belong To Me - Anjelica [720p].mp4
12/12/2012	Far Cry 3 [MULTI12]
12/11/2012	My Dying Bride - A Map of All Our Failures (2012)
12/10/2012	The.Bourne.Legacy.2012.BluRay.1080p.x264-LTT
12/09/2012	Resident.Evil.Retribution.2012.1080p.BluRay.x264.DTS-HDChina [PublicHD]

EXHIBIT C

Hit Date UTC	Filename
12/08/2012	KBlaze
12/08/2012	x-art_angelica_introducing_angelica_1080.mov
12/08/2012	X-Art - Inside Perfection - Angelica [1080p].mov
12/05/2012	Bones.S08E08.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
12/05/2012	Bones.S08E06.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
12/05/2012	Bones.S08E09.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
12/05/2012	Bones.S08E07.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
12/04/2012	[Ani-HL] Girls und Panzer - 03 [1280x720].mkv
12/04/2012	Pornstarplatinum.Eva.Notty.With.Mark.Wood.pornalized.avi
12/03/2012	Bones.S08E06.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
12/03/2012	아랑사또전 E16 121004 HDTV X264 720P AAC-SinCara
12/03/2012	Total.Recall.2012.Extended.DC.BluRay.1080p.DTS+AC3 LTT
12/02/2012	Idol.2010.Final.E01.Part1.SWEDISH.HDTV.XviD-D2V
12/02/2012	Men.in.Black.III.2012.DVDRip.XviD-iGNITION
12/02/2012	Top.Gear.The.Worst.Car.In.The.History.Of.The.World.2012.1080p.BluRay.x264-TENEIGHTY [PublicHD]
12/02/2012	The.Amazing.Spider-Man.2012.1080p.BluRay.X264-AMIABLE [PublicHD]
12/01/2012	Skins.US.S01E03.Chris.PROPER.HDTV.XviD-FQM
12/01/2012	The.Bourne.Legacy.2012.1080p.BluRay.REMUX.DTS-HD.MA.7.1-PublicHD
11/30/2012	Call.of.Duty.Black.Ops.II.Update.1.and.2-SKIDROW
11/30/2012	Black Ops 2
11/30/2012	Call.of.Duty.Black.Ops.II-SKIDROW.rar
11/29/2012	Call.of.Duty.Black.Ops.II-SKIDROW
11/29/2012	Samantha.Who.SWESUB.S01E01.HDTV.XviD-Terminator.avi
11/18/2012	Warehouse.13.S04E07.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
11/18/2012	Warehouse.13.S04E09.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
11/18/2012	Fringe S05E01 720p WEB-DL DD5.1 H264-EbP [PublicHD]

EXHIBIT C

Hit Date UTC	Filename
11/18/2012	Fringe.S05E04.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
11/18/2012	Warehouse.13.S04E10.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
11/18/2012	Fringe S05E02 720p WEB-DL DD5.1 H264-EbP [PublicHD]
11/18/2012	WowGirls - State Of The Art Massage - Melanie B, Stephanie [720p].mp4
11/18/2012	Fringe.S05E05.1080p.WEB-DL.DD5.1.H.264 [PublicHD]
11/18/2012	Fringe S05E03 720p WEB-DL DD5.1 H264-EbP [PublicHD]
11/18/2012	121AENFD5354.avi
11/18/2012	Warehouse.13.S04E08.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
11/18/2012	Fringe S05E07 720p WEB-DL DD5.1 H264-EbP [PublicHD]
11/14/2012	Bones.S08E05.1080p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
11/07/2012	The.Avengers.2012.1080p.BluRay.DTS.x264-PublicHD
11/05/2012	The.Mentalist.S05E04.HDTV.XviD-AFG
10/24/2012	FTVGirls.12.10.20.Emily.Full.FTV.Experience.XXX.1080p.WMV-IEVA[rbg]
10/23/2012	MythBusters.S11E01.Titanic.Survival.720p.HDTV.x264-DHD [PublicHD]
10/23/2012	MythBusters.S11E02.Trench.Torpedo.720p.HDTV.x264-DHD [PublicHD]
10/17/2012	The.Walking.Dead.S03E01.1080p.WEB-DL.AAC2.0.H.264-TB [PublicHD]
10/14/2012	South.Park.S16E09.720p.WEB-DL.AAC2.0.H.264-CtrlHD [PublicHD]
10/14/2012	Mad Men - Season 5, Episode 6 Far Away Places HDTV XviD-playHD
10/14/2012	South.Park.S16E10.720p.WEB-DL.AAC2.0.H.264-CtrlHD [PublicHD]
10/12/2012	[Alice no Takarabako (Mizuryu Kei)] MC Gakuen Yojigenme.zip
10/10/2012	Bones.S08E01.720p.HDTV.X264-DIMENSION.mkv
10/10/2012	18XGirls - Anjelica Gets Oiled Up For A Thick Dick [1080p].wmv
10/10/2012	Bones.S08E04.720p.HDTV.X264-DIMENSION [PublicHD]
10/10/2012	YoungLegalPorn - I Miss You - Kitana [1080p].mp4
10/10/2012	WowGirls Cock Addicts Anjelica, Zoe
10/10/2012	WowGirls - Lesbian - Gloria, Jasmin [1080p].mp4

EXHIBIT C

Hit Date UTC	Filename
10/10/2012	WowGirls Fruity Chick Stephanie
10/07/2012	The Hunger Games 2012 1080p BluRay x264-BLOW
10/07/2012	The.Hunger.Games.2012.1080p.BluRay.x264-BLOW [PublicHD]
10/07/2012	The Hunger Games (2012) 1080p BluRay x264 [GlowGaze.Com]
10/03/2012	doctor_who_2005.7x02.dinosaurs_on_a_spaceship.hdtv_x264-fov.mp4
10/03/2012	Underworld Awakening 2012 BluRay 1080p DTS x264-3Li
10/03/2012	Bones.S08E03.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/30/2012	Snow.White.and.the.Huntsman.2012.EXTENDED.BluRay.1080p.x264 LTT
09/30/2012	aTunes - Spela-hantera musik-video frenlig iTunes-iPod [GNU-Linux] [Svensk-Swedish]
09/30/2012	In.Time.2011.1080p.BluRay.DTS.x264-ESiR
09/29/2012	Doctor.Who.2005.S07E05.720p.HDTV.x264-BiA [PublicHD]
09/26/2012	Bones.S08E02.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/26/2012	Bones.S08E02.720p.HDTV.X264-DIMENSION.mkv
09/24/2012	Bones.S08E01.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/23/2012	Doctor_Who_2005.7x04.The_Power_Of_Three.720p_HDTV_x264-FoV [PublicHD]
09/22/2012	Prometheus.2012.720p.WEB-DL.DD5.1.H.264-CtrlHD [PublicHD]
09/22/2012	Prometheus.2012.BluRay.1080p.x264 LTT
09/21/2012	Doctor.Who.2005.S07E01.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/21/2012	X-Art - Black Lace Bliss - Gianna [1080p].mov
09/21/2012	Doctor.Who.2005.S07E03.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/21/2012	X-Art - Underwater Lover - Silvie, Kaylee [1080p].mov
09/21/2012	Doctor.Who.2005.S07E02.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
09/21/2012	x-art.com_Gianna_Black_Lace_Bliss_1080.mov
09/16/2012	Doctor.Who.2005.S07E03.720p.HDTV.x264-BiA [PublicHD]
09/15/2012	HIM - Ultra Rare Trax Vol 1
09/15/2012	X-Art - House Of The Rising Sun - Jessie [1080p].mp4

EXHIBIT C

Hit Date UTC	Filename
09/15/2012	Game.of.Thrones.S02.720p.HDTV.DD5.1.x264-EbP [PublicHD]
09/13/2012	Game of Thrones Season 1 (BluRay 1080p MultiSub) [FtR]
09/11/2012	Mission Impossible Ghost Protocol 2012 BRRip XviD AC3-DEO
09/10/2012	Game of Thrones Season 1 Complete 720p
09/10/2012	[www.Speed.Cd] - Big Mommas Like Father Like Son 2011 R5 XviD AC3-SANTi
09/09/2012	Mad.Men.S02E01.HDTV.XviD.VOSTFR-GuiKs.avi
09/09/2012	Men.in.Black.3.2012.BluRay.1080p.x264 LTT
09/09/2012	Doctor.Who.2005.7x02.Dinosaurs.On.A.Spaceship.720p.HDTV.x264-FoV.mkv
09/09/2012	Lockout.2012.UNRATED.1080p.BluRay.X264-BLOW [PublicHD]
09/08/2012	The.Big.C.S03E07.720p.HDTV.x264-IMMERSE [PublicHD]
08/30/2012	Johnny English Reborn (Engl)_2011
08/29/2012	Family Guy S10E02 HDTV XviD-LOL [VTV]
08/29/2012	Warehouse.13.S04E06.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
08/26/2012	Warehouse.13.S04E05.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
08/26/2012	Warehouse.13.S04E04.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
08/26/2012	Warehouse.13.S04E03.720p.WEB-DL.DD5.1.H.264-POD [PublicHD]
08/17/2012	Futurama.S07E09.720p.WEB-DL.DD5.1.H.264-CtrlHD [PublicHD]
08/16/2012	30 Rock Sn6 Ep10 HD-TV - Alexis Goodlooking and the Case of the Missing Whisky - Cool Release
08/16/2012	The.Middle.S02E24.HDTV.XviD-FEVER
08/16/2012	X-Art_-_Jessie_and_Anais_HD_1080p
08/16/2012	Stargate Atlantis Season 2
08/09/2012	Harry Potter and the Half Blood Prince (2009) [1080p]
08/09/2012	Harry Potter and the Order of the Phoenix (2007) [1080p]
08/08/2012	Futurama.S07E08.720p.WEB-DL.DD5.1.H.264-CtrlHD [PublicHD]
08/06/2012	X-Art - Farewell - Jessie [1080p].mp4
08/06/2012	X-Art.12.08.03.Jessie.Farewell.XXX.1080p.MP4-KTR

EXHIBIT C

EPA138

Hit Date UTC	Filename
08/06/2012	x-art_jessie_farewell_1080.mp4
08/06/2012	WowGirls - Taste My Clit - Anjelica, Zaya [720p].mp4
07/28/2012	WowGirls - Viagra - Gloria, Jasmin, Sasha [1080p].mp4
07/28/2012	x-art_avril_keira_come_to_my_window_540.wmv
07/28/2012	x-art_avril_keira_come_to_my_window_1080.mov
07/28/2012	WowGirls.com - On The Top Of Pleasure - Hayden, Riley Reid [720p].mp4
07/28/2012	Angela - A Scream Of Orgasm.mp4
07/21/2012	Eureka.S05E13.720p.WEB-DL.DD5.1.H.264-ECI [PublicHD]
07/20/2012	Anjelica_Intimate_Caresses_HD1080.mp4
07/20/2012	Top.Gear.Australia.S02E07.x264.720p.zbox-1.mp4
07/20/2012	ShesAFreak.12.07.08.Franziska.Facella.Fuck.The.Roses.XXX
07/19/2012	X-Art - Pink Orgasm - Hayden H [1080p].mov
07/19/2012	SexUnderwater.12.07.08.Haydens.Swim.XXX
07/19/2012	1By-Day_-_Jessyka_Swan_-_Newbie_Meets_The_Fucking_Machine_HD_1080p
07/19/2012	Sindy and Olga.mp4
07/18/2012	Futurama.S07E05.720p.WEB-DL.DD5.1.H.264-CtrlHD [PublicHD]
07/18/2012	Futurama.S07E04.720p.WEB-DL.DD5.1.H.264-CtrlHD [PublicHD]

EXHIBIT C

EXCULPATORY EVIDENCE REQUEST

Subscriber Name:

Subscriber Address:

Attorney Name/Contact:

1. List all authorized users (including household members) of any IP Address assigned to the Defendant.

Authorized User Name/Relationship

A. _____

- ☐ Adult Child
- ☐ Domestic Partner
- ☐ Minor Child
- ☐ Roommate
- ☐ Spouse
- ☐ Tenant
- ☐ Unrelated adult

B. _____

- ☐ Adult Child
- ☐ Domestic Partner
- ☐ Minor Child
- ☐ Roommate
- ☐ Spouse
- ☐ Tenant
- ☐ Unrelated adult

C. _____

- ☐ Adult Child
- ☐ Domestic Partner
- ☐ Minor Child
- ☐ Roommate
- ☐ Spouse
- ☐ Tenant
- ☐ Unrelated adult

EXHIBIT D

D. _____

- ☐ Adult Child
- ☐ Domestic Partner
- ☐ Minor Child
- ☐ Roommate
- ☐ Spouse
- ☐ Tenant
- ☐ Unrelated adult

2. Has a WI-FI enabled device been used to effectuate a connection to an IP Address assigned to the Defendant?

YES NO

3. If #2 is yes, please provide make, model and serial number of all such WI-FI modems and/or routers:

4. Has a Bittorrent Client been installed on any electronic device used by the Defendant and/or other Authorized Users used to access the Internet via an IP Address assigned to the Defendant?

YES NO

5. What is the distance from the Defendant's residence to the closest neighbor?

_____ Yards.

EXHIBIT D

6. Has the Defendant and/or Authorized Users as listed in #1 above ever legally purchased Plaintiff's material or visited their website?

YES NO

7. Has the Defendant and/or Authorized Users as listed in #1 above ever visited any website containing Torrent Magnet Links?

YES NO

8. Has the Defendant and/or Authorized Users as listed in #1 above ever used Google, Bing, Yahoo or any other Internet Search Engine to search for information on Torrent files and/or websites?

YES NO

9. Has the Defendant and/or Authorized Users as listed in #1 above ever visited a streaming media site containing unauthorized copies of Plaintiff's works?

YES NO

10. Has the Defendant and/or any Authorized User as listed in #1 received a notice of copyright infringement from their Internet Service Provider, from the Center for Copyright Information, or from any other private intellectual property owner?

YES NO

Signed

Date

EXHIBIT D

EPA138